



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

26735

September 26, 1995

4WD-SSRB

MEMORANDUM:

SUBJECT: Review of CERCLA Sites for Determination of NFRAP Status

FROM: John A. McKeown
Site Assessment Section
South Superfund Remedial Branch, WMD

TO: File

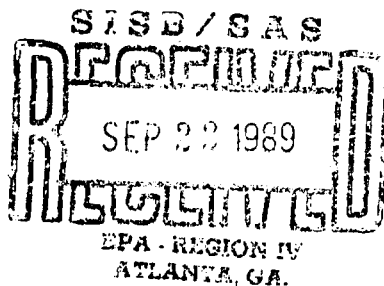
The U.S. EPA has recently reviewed the CERCLA files for the following sites:

- | | |
|---------------------------------------|----------------|
| 1) Amoco Fabrics Co. Hazelhurst Mills | - GAD046907689 |
| 2) Boeing Machine Products | - GAD000615914 |
| 3) D&D Drums & Pallets | - GAD980729511 |
| 4) Griffin Shoal Creek Landfill | - GAD981025240 |
| 5) Mathis Brothers Chickamauga RD LF | - GAD980838494 |
| 6) Lafayette Sheet Metal | - GAD984270553 |
| 7) Westinghouse Electric | - GAD003295144 |

After review of the files, a determination of No Further Response Action Planned (NFRAP) has been made for each of the aforementioned sites. A copy of this memorandum will be placed in each respective file.



1927 LAKESIDE PARKWAY
SUITE 614
TUCKER, GEORGIA 30084
404-938-7710



C-586-9-9-45

September 19, 1989

Mr. A. R. Hanke
Site Investigation and Support Branch
Waste Management Division
Environmental Protection Agency
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Date: ~~2-1-90~~
Site Disposition: concur phase II
EPA Project Manager: *[Signature]*

Subject: Screening Site Inspection, Phase I
Boeing Machine Products
Macon, Bibb County, Georgia
EPA ID No. GAD000615914
TDD No. F4-8908-41

1260

*Missing
the References*

Dear Mr. Hanke:

FIT 4 was tasked to conduct a Screening Site Inspection at Boeing Machine Products in Macon, Bibb County, Georgia. Phase I of the inspection included a review of EPA and state file material, completion of a target survey and an offsite reconnaissance of the facility and surrounding area.

Boeing Machine Products is a manufacturing plant located at 7979 N.E. Industrial Boulevard in Macon (Ref. 1). The facility produces machine parts for the Boeing Commercial Airplane Company (Ref. 5). Land in the vicinity is used for both industrial and residential purposes. The nearest residences are 1000 feet south of the facility across Avondale Mill Road (Ref. 2).

The Boeing Company, Seattle, Washington, is the owner of the facility, which has been producing machine parts for aircraft since April 1, 1981 (Ref. 3). The facility covers about 15 acres (Ref. 4). Activities at the facility include plating steel and alloy steels with cadmium, nickel, chromium, and copper. Other activities include anodizing and applying chromate conversion coatings to aluminum- and cadmium-plated parts (Ref. 5).

Wastes produced at the facility include sludge from waste treatment of electroplating, paint solvents (non-halogenated solvents such as acetone, methyl ethyl ketone and toluene), outdated paints and thinners and spent halogenated solvents (Refs. 1, 3, 6). In 1984, the company reported the following annual waste quantities: 165 gallons of spent non-halogenated solvents; 100 cubic yards of waste treatment sludges; 20,000 gallons of spent halogenated degreasing solvents; and 25 gallons of spent halogenated solvents (Ref. 3). Estimated total waste quantity is 30 tons per year (Ref. 6). All wastes are disposed of by approved disposers (Ref. 5). Site inspections by Georgia EPD personnel on March 1, 1989 indicated that small spills from roll-off containers were apparently flowing into the parking lot. Also, a spill from the scrubber water system occurred on July 8, 1983. The spilled solution contained 6 ppm chromium. The resulting contaminated soil was dug up and disposed of as a hazardous waste (Refs. 1, 6).

Mr. A.R. Hanke
Environmental Protection Agency
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The facility filed a RCRA Part A application on November 19, 1980 and a revised Part A on May 14, 1984 (Refs. 3, 5). The status for the facility was changed to that of a generator only on April 14, 1986 (Ref. 7).

The site is in the Atlantic Coastal Plain hydrogeologic regime consisting of complexly interbedded sand, silt and clay layers, which dip to the southeast (Ref. 8). Under these sedimentary deposits, the crystalline rock basement may be found at a depth of approximately 500 feet below land surface (bls) (Ref. 9, p. 23). The deepest aquifer used is the Tuscaloosa aquifer, which is found at a depth of 37 feet bls. This aquifer consists of layers of fine to coarse sand with minor interbedded clay (Ref. 9, p. 24). A 7-foot-thick clay layer found at 30 feet bls is the Eutaw confining layer. The surficial sands of the Blufftown Formation are considered the surficial aquifer and are 30-feet thick (Ref. 9, p. 24). The clays of the Eutaw represent the layer of lowest hydraulic conductivity with values in the 1×10^{-5} to 1×10^{-7} cm/sec range. The net annual rainfall for this area is 3 inches and the 1-year, 24-hour rainfall is 3.3 inches (Refs. 10, pp. 43, 63; 11, p. 93).

Surface water drainage at the facility would flow southwest overland 5000 feet to the Echeconnee Creek. This creek flows east-southeast for approximately 10 miles to the Ocmulgee River, which continues for the remainder of the 15-mile migration pathway (Ref. 4). No municipal intakes are located within 15-mile downstream of Boeing (Ref. 12). Sport fishing does occur on the Ocmulgee River (Ref. 13).

Four municipal water systems serve the area near the plant: the Macon-Bibb County Water Department, the city of Warner Robins Water Department, the city of Centerville Water Department and Houston County Water Department (Refs. 2, 4). The Macon-Bibb County Water Department is supplied by surface water. The intake is located on the Ocmulgee River 9 miles upstream from the confluence of the Ocmulgee River and the Echeconnee Creek. The city has an emergency well located at the airport approximately 1.5 miles northeast of the facility. This well is rarely used and would not supply enough water for the system's needs (Ref. 2).

The city of Warner Robins has 15 groundwater wells, ranging in depths from 200 to 500 feet. The system is a loop. Two of the city's wells are between the 3- and 4-mile radius. The system has about 15,000 connections (Refs. 1, 14).

The Houston County Water Department has five separate systems. The two wells for the Dunbar-Elberta system, with depths of 485 and 350 feet are between the 3- and 4-mile radius. The Dunbar-Elberta system has about 598 connections. The system is usually isolated into its two parts Dunbar and Elberta, but has an emergency tie-in to lift water from Elberta to Dunbar. This emergency use is rare, but the pumps are tested occasionally and the water allowed to flow to the Dunbar system (Refs. 1, 15, 16, 17).

The city of Centerville currently has two groundwater wells, and will have another on-line within a month. All wells are about 600 feet deep. One existing well and the new well are between the 3- and 4-mile radius. The system has about 1,940 connections (Refs. 2, 18).

Mr. A.R. Hanke
Environmental Protection Agency
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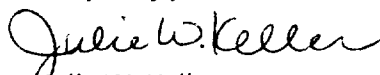
Residents not served by one of the municipal water systems obtain water from private wells. The nearest private wells to the facility are located 4,000 feet northwest on Clay Circle, off of Avondale Mill Road (Refs. 2, 4). The owners contacted did not know the depths of their wells (Ref. 2). Discussion with a local well driller indicates wells in this area to be 180-220 feet deep (Ref. 19). A house count indicates that 475 homes within a 3-mile radius are not served by a municipal system. Additionally, 443 homes, are located between 3 and 4 miles from the site are not served by a municipal system (Refs. 2, 4).

During an offsite reconnaissance, the facility was not accessible. The loading and outside storage areas were fenced. No stressed vegetation was noted (Ref. 2).

Although the ranges of some endangered or threatened species include the state of Georgia, there are no critical habitats designated in Bibb County (Ref. 20). Freshwater wetland areas are located to the southwest of the site about 4,000 feet (Ref. 4).

Due to the drinking water targets located between 3 and 4 miles from the site, FIT 4 recommends Phase II of this Screening Site Inspection be conducted on a medium-priority basis. If you have any questions about this assessment, please contact me at NUS Corporation.

Very truly yours,

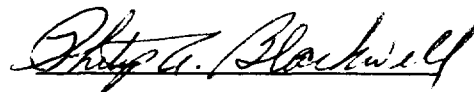

Julie W. Keller
Project Manager

JWK/kw

Enclosures

cc: Mario Villamarzo

Approved:



REFERENCES

1. Potential Hazardous Waste Site Preliminary Assessment (EPA Form 2070-12) for Boeing Machine Products, Macon, Georgia. Prepared by David A. Brackett, Georgia Department of Natural Resources, March 1, 1984.
2. NUS Field Logbook No. F4-1601 for Boeing Machine Products, TDD No. F4-8908-41. Documentation of facility reconnaissance, August 31, 1989.
3. Letter and attachments from Robbie Barrett, Hazardous Waste Administrator, Boeing Machine Products to Mark Smith, Georgia Department of Natural Resources, May 14, 1984. Subject: Revised Part A application and waste analysis plan.
4. U.S. Geological Survey, 7.5 minute series Topographic Quadrangle Maps of Georgia: Warner Robins NE (Photorevised 1984), Warner Robins SE (1973), Macon East (Photorevised 1985), Macon West (Photorevised 1985), Warner Robins NW (Photorevised 1985), scale 1:24,000.
5. General Information (EPA Form 3510-1) for Boeing Machine Products, Inc., Macon, Georgia. Prepared by R. M. Myer, Boeing Machine Products, November 19, 1980.
6. Waste Management Data Sheet, Environmental Protection Division, Georgia Department of Natural Resources for Boeing Machine Products. Prepared by Robert E. Barrett, Boeing Machine Products, March 10, 1984.
7. Jennifer R. Kaduck, Department of Natural Resources letter to Ron Myer, Boeing Georgia, Inc., April 14, 1986. Subject: Change of Facility Status, compliance status as a generator.
8. Linda Aller, et. al., DRASTIC: A Standardized System for Evaluating Groundwater Pollution Using Hydrogeologic Settings, EPA-600/2-87-035 (Ada, Oklahoma: US EPA, April 1987).
9. Stephen M. Herrick, Well Logs of the Coastal Plain of Georgia, Bulletin No. 70 (State of Georgia, 1961).
10. U.S. Department of Commerce, Climatic Atlas of the United States, (Washington, D.C.: GPO, June 1968), Reprint: 1983, National Oceanic and Atmospheric Administration, pp. 43, 63.
11. U.S. Department of Commerce, Rainfall Frequency Atlas of the United States, Technical Paper No. 40, (Washington, D.C.: GPO, 1963), p. 93.
12. Environmental Protection Division, Georgia Department of Natural Resources, Water Availability and Use: Ocmulgee River Basin, (1985).
13. Jimmy Evans, Georgia Department of Natural Resources Fisheries Section, telephone conversation with Terry Tanner, NUS Corporation, February 8, 1989. Subject: Commercial and sport fishing on the Ocmulgee River in the Macon area.
14. Donnie Allen, Warner Robins Water Department, telephone conversation with Julie Keller, NUS Corporation, September 5, 1989. Subject: Water System.
15. James Bruce, Houston County Water Department, telephone conversation with Julie Keller, NUS Corporation, September 5, 1989. Subject: Location of groundwater wells.

16. Matt Matthews, Houston County Water Department, telephone conversation with Julie Keller, NUS Corporation, September 5, 1989. Subject: Dunbar and Elberta systems.
17. Paula Miller, Houston County Water Department, telephone conversation with Julie Keller, NUS Corporation, September 7, 1989. Subject: Well depths of the Dunbar and Elberta wells.
18. Henry Childs, Centerville Water Department, telephone conversation with Julie Keller, NUS Corporation, September 5, 1989. Subject: Number of customers served.
19. Gerald Green, Green's Well Drilling, telephone conversation with Julie Keller, NUS Corporation, September 7, 1989. Subject: Well depths in the Avondale Mill Road and Clay Circle area.
20. U.S. Fish and Wildlife Service, Endangered and Threatened Species of the Southeastern United States, (Atlanta, Georgia: 1988).

RECONNAISSANCE CHECKLIST FOR HRS2 CONCERNS

Instructions: Obtain as much "up front" information as possible prior to conducting fieldwork. Complete the form in as much detail as you can, providing attachments as necessary. Cite the source for all information obtained.

Site name: Boeing Machine Products
City, County, State: Macon, Bibb County, Georgia
EPA ID No.: GAD000615914
Person responsible for form: Julie Keller
Date: 9/5/89

Air Pathway

Describe any potential air emission sources onsite: none

Identify any sensitive environments within 4 miles: none

Identify the maximally exposed individual (nearest residence or regularly occupied building - workers do count): Workers at the plant

Groundwater Pathway

Identify any areas of karst terrain: none

Identify additional population due to consideration of wells completed in overlying aquifers to the AOC: additional population in Centerville and Warner Robins.

Do significant targets exist between 3 and 4 miles from the site? City of Centerville, Warner Robins and Houston County wells?

Is the AOC a sole source aquifer according to Safe Drinking Water Act? (i.e. is the site located in Dade, Broward, Volusia, Putnam, or Flager County, Florida) No

Surface Water Pathway

Are there intakes located on the extended 15-mile migration pathway? *no*

Are there recreational areas, sensitive environments, or human food chain targets (fisheries) along the extended pathway? *recreational fishing, Swamps*

Onsite Exposure Pathway

Is there waste or contaminated soil onsite at 2 feet below land surface or higher? *unknown*

Is the site accessible to non-employees (workers do not count)? *no*

Are there residences, schools, or daycare centers onsite or in close proximity?

nearest residence 1000 ft south

Are there barriers to travel (e.g., a river) within one mile? *no*

Georgia Department of Natural Resources

205 Butler Street, S.E., Floyd Towers East, Atlanta, Georgia 30334

J. Leonard Ledbetter, Commissioner
Harold F. Reheis, Assistant Director
Environmental Protection Division
(404) 656-4713

April 14, 1986

WES
cc WCS
WPS- R/LA

Mr. Ron Myer
Vice President-General Manager
Boeing Georgia, Inc.
Post Office Box 10248
Wilson Airport
Macon, Georgia 31297

RE: Change of Facility Status,
Compliance Status as a Generator,
GAD 000615914

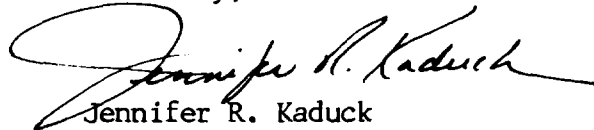
Dear Mr. Myer:

The Environmental Protection Division has reviewed your request for withdrawal of the hazardous waste permit application for your facility in Macon, Georgia. Based on the December 16, 1985 inspection of your facility by Mr. Mark Smith of our staff, a change in status for the facility to that of a Generator only is warranted. Your permit application is hereby withdrawn and your interim status authorization to store hazardous wastes for extended periods terminated. Except for satellite accumulation areas, hazardous wastes must not be stored for more than 90 days after accumulation begins. In designated satellite accumulation areas, as much as 55 gallons of wastes (not acutely toxic) may be accumulated prior to transfer to a central storage area. Wastes may not be stored in this central area for more than 90 days.

During the inspection mentioned above, the facility was evaluated for compliance with the Part 262 regulations applicable to generators of hazardous wastes. No violations of the regulations were noted. Your facility is considered to be in full compliance with the Georgia Rules for Hazardous Waste Management.

Should you have any questions concerning the inspection or the change in your status, feel free to contact Mr. Smith at 404/656-7802. Your continued cooperation in protecting the environment of Georgia is appreciated.

Sincerely,



Jennifer R. Kaduck
Program Manager
Hazardous Waste Management Program

JRK:msd:1929M

cc: Mr. James H. Scarbrough, U.S. EPA ✓
Ann Cockrill

File: Boeing Machine Products (Y)

ROUTING AND TRANSMITTAL SLIP

Date

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. <i>Wayne</i>		
2. <i>Clare</i>		
3.		
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

*Was Boeing an
I.S. storage facility?
How about closure?*

DO NOT use this form as a RECORD of approvals, concurrences, disposes, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
<i>Mickey</i>	Phone No.

5041-102

*U.S.GPO:1965-0-481-247/20032

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

Form for RCRA Facility Management Strategy ^{Plan}

I. Facility Information Boeing Georgia (formerly
Facility Name: Boeing Machine Products)
EPA I.D. No.: GAD 000615914
Facility Address: P.O. Box 10248, 2600 Airport +
Macon Georgia 31297

Facility Management Strategy Prepared By:

Name: Mark Smith
Agency/Organization: EPA

RCRA Regulated Units at Facility

- ☒ Storage in Tanks or Containers
☐ Incinerator
☐ Land Fill
☐ Surface Impoundment
☐ Waste Pile
☐ Land Farming

OUTLINE FOR DEVELOPING A FACILITY MANAGEMENT STRATEGY

- I. Evaluation of Information Concerning Solid Waste Management Units and Prior or Continuing Releases (PA/SI) and Summary of Inspections at the Facility.
- II. Evaluation of Groundwater Data and Assessment of Need for Interim Status Corrective Action Order
- III. Evaluation of CERCLA Authority at Facility and Relationship with RCRA
- IV. Summary of Part B Application Review to Date, Problems, Issues, Actions Needed
- V. Summary of Facility Status and Proposed actions (in order of priority) for Resolving Environmental Problems and Processing Part B Application

I. Evaluation of Information Concerning Solid Waste Management Units and Prior or Continuing Releases (PA/SI)

The main purpose is to determine whether or not there have been or may have been prior or continuing releases of hazardous waste or hazardous constituents from solid waste management units which would require corrective action under Section 3004U of the Hazardous and Solid Waste Act. The solid waste management units of concern are:

- a) Solid waste management units not currently regulated under RCRA
- b) Solid waste management units regulated under RCRA but not subject to groundwater monitoring requirements

The purpose of this review is to determine:

- a) Do such units exist?
- b) Have there been prior or continuing releases of hazardous wastes or hazardous constituents from such units?
- c) Have releases caused environmental contamination that would warrant corrective action?
- d) If the answers to questions no. 1, 2 and 3 above are not clear yes or no answers, what additional data, information or investigation is needed to make a clear yes or no answer?

This review has two main components. The first is a review of the questionnaire sent to the applicant re Solid Waste Management Units and prior or continuing releases of hazardous waste. The second part is a summary of inspections done at the facility and observations related to Solid Waste Management Units.

The attached flow charts show the key decision points for the two categories of solid waste management units.

A. Review of Solid Waste Management Unit Questionnaire:

- 1) Date questionnaire re Solid Waste Management Units was sent out 1-9-85
- 2) Date response received _____
- 3) Review of response indicates
 - _____ a) Solid Waste Management Units exist
(Other than RCRA regulated units)
 - _____ b) No Solid Waste Management Units exist
(Other than the RCRA regulated units shown on Part A and Part B application)
 - _____ c) It is not clear from review of questionnaire whether or not any Solid Waste Management Units exist - additional information and/or a site visit will be required

- 4) If response to No.3 above is (a) then answer this question

In regard to prior or continuing releases of Hazardous Wastes or Hazardous Constituents the response to the questionnaire indicates:

- _____ a) Releases of Hazardous Wastes or constituents have occurred or are thought to have occurred
- _____ b) Releases of Hazardous Wastes or constituents have not occurred
- _____ c) It is not known whether releases of Hazardous Wastes or Hazardous constituents have occurred

- 5) For RCRA regulated units that do not have groundwater monitoring the response to the questionnaire indicated

- _____ a) Releases of Hazardous Wastes or constituents have occurred or are thought to have occurred
- _____ b) Releases of Hazardous Wastes or constituents have not occurred
- _____ c) It is not known whether releases of Hazardous Wastes or Hazardous constituents have occurred

- 6) Environmental Monitoring Data associated with prior or continuing releases is available for the following areas:

- _____ a) Groundwater
- _____ b) Air
- _____ c) Surface Waters
- _____ d) Soils

- 7) Environmental Monitoring Data noted in No. 6 above can be summarized as follows:

DESCRIPTION	Ground-water	Air	Soils	Surface Water
Hazardous Wastes or Constituents have been detected				
Environmental Standards have been violated				

8) Did the facility submit a 103(c) Notification under CERCLA?

_____ a) Yes

X b) No

9) If the answer to No. 8 above is yes, did the facility list the same units on the Solid Waste Management Questionnaire as they did on the CERCLA 103(c) Notification Form?

_____ a) Yes

_____ b) No

B. Summary of Inspection at Facility

1) During the inspection of this facility did the inspector note any evidence of past waste disposal practices not currently regulated under RCRA such as piles of waste or rubbish, ponds or surface impoundments that might contain waste, active or inactive landfills?

_____ a) Yes, Explain _____

X b) No

_____ c) Cannot Respond to this Question

2) Was there any evidence of discolored soils or dead vegetation that might be caused by a spill, discharge or disposal of hazardous wastes or constituents?

_____ a) Yes, Explain _____

X b) No

_____ c) Cannot Respond to this Question

3) Are there any tanks at the facility which are used for waste storage (solid or hazardous) which are located below grade and could possibly leak without being noticed by visual observation?

X a) Yes

_____ b) No

_____ c) Cannot Respond to this Question

- 4) Based on an inspection or inspections that have been done at this facility there is no reason to question or doubt the information which the applicant has submitted on the questionnaire re Solid Waste Management Units and the possibility of prior or continuing releases of hazardous wastes or constituents.

_____ a) I concur with this statement

_____ b) I do not concur with this statement for the following reasons:

_____ c) My knowledge of Facility is not sufficient for me to concur or non-concur with the information in the Solid Waste Management Unit Questionnaire.

- 5) If 4(b) was checked,
Describe what additional information or testing is needed to determine if prior or continuing releases of hazardous wastes or constituent have occurred. Specify which units are of concern and what types of releases are suspected. (i.e., releases to groundwater, surface water, air, soils, etc.)

Date or Dates of Inspections May 9, 1984

Inspectors Name Mark O. Smith

Inspectors Signature Mark O. Smith

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- 6) An on-site inspection to discuss and evaluate the possibility of prior or continuing releases from Solid Waste Management Units is recommended

_____ a) Yes

X b) No

II. Evaluation of Groundwater Data and Assessment of Need for Interim Status Corrective Action Order

- 1) A review of Interim Status Groundwater Data, Groundwater Data included in the Part B application and information concerning Solid Waste Management Units and prior or continuing releases indicates:

_____ a) There is groundwater contamination that is caused by a RCRA regulated unit or a Solid Waste Management Unit

_____ b) There is no indication of groundwater contamination caused by RCRA regulated units or Solid Waste Management Units

_____ c) Information available is insufficient to conclusively determine the presence or absence of groundwater contamination

- 2) If (a) or (c) above is checked, please address these questions regarding affected aquifers and water supply wells in the vicinity of the facility

_____ a) Aquifers that have or may have contamination are used as a drinking water source and withdrawal wells are located within 2500 ft. of regulated units

_____ b) Aquifers that have or may have contamination are used as a drinking water source and withdrawal wells are located more than 2500 ft. from regulated units. Approximate distance is _____ feet.

_____ c) Aquifers that have or may have contamination are not used as a drinking water source within a 2 mile radius of facility.

- 3) For water supply wells that may have groundwater contamination please indicate:

_____ a) Water samples have been analyzed and groundwater contamination has been confirmed.

_____ b) Water samples have been taken and no contamination is indicated

_____ c) No sampling and analysis has been done on water supply wells

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- 4) Issuance of a RCRA permit to this facility is likely to take:

<u>Time</u>	<u>Mo/Yr</u>
a) 0-6 months	_____
b) 6-12 months	_____
c) 12-18 months	<u>August, 1986</u>
d) more than 18 months	_____

- 5) Considering the information provided in Items No. 1, 2, 3, and 4 above indicate your evaluation of the need for an interim status corrective action order:

- _____ a) Due to the significant hazard or potential for a significant hazard and the time required to issue the RCRA permit, corrective action should begin immediately through the use of an interim status corrective action order (summarize reasons below)
- _____ b) Since a significant hazard does not appear to exist or since the RCRA permit will be issued shortly, there does not appear to be a need to issue an interim status corrective action order (summarize why below)
- _____ c) Presently available information is not sufficient to reach the conclusions of (a) or (b) above; however, because drinking water wells are utilized in the immediate vicinity of the facility (2500 ft. or less) an enforcement action should be issued to expedite the gathering of appropriate data for items 1, 2 or 3 above (summarize information needed below)

III. Evaluation of CERCLA Authority at Facility and Relationship with RCRA

- 1) Did this facility submit a 103 (c) notification form under CERCLA?

_____ a) Yes

X _____ b) No

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- 2) If the answer to No.1 is No, should this facility have submitted a 103 (c) notification form under CERCLA?

☐ a) Yes

☒ b) No

- 3) Has a CERCLA Preliminary Assessment/Site Investigation (PA/SI) been completed for this site?

☒ a) Yes

☐ b) No

- 4) If a CERCLA PA/SI has been completed for this site summarize briefly the findings focusing on environmental contamination, imminent hazards and wastes found.

Remedial action is required for the site.

- 5) After reviewing the CERCLA Notification form, the RCRA Part A and Part B applications it appears that:

☐ a) The RCRA units and CERCLA units are one and the same

☐ b) The RCRA units and CERCLA units are clearly different units

☐ c) There is overlap between the RCRA and CERCLA units some are the same and some are different

- 6) This facility is (is not) included on the CERCLA National Priorities List (NPL)

☐ a) Yes, it is

☒ b) No, it is not

- 7) Based on the information noted in Items No. 1, 2, 3 and 4 above and on current guidance from EPA-Headquarters on RCRA-CERCLA interface corrective action for CERCLA units should be handled as follows

☐ a) Totally within the RCRA permit

☐ b) RCRA-CERCLA activities proceed simultaneously with ultimate CERCLA corrective action being written into RCRA permit as a compliance schedule

☐ c) CERCLA action alone

IV. Summary of Part B Application Review to Date, Problems, Issues, Actions Needed

A. Key Dates

- 1) Date Part B Called Cc + 15, 985
- 2) Date Part B Received _____
- 3) Date First NOD Sent _____
- 4) Date First Revised Part B received _____
- 5) Date 2nd NOD Sent _____
- 6) Date of Enforcement Actions for Deficient Part B _____
- 7) Date 2nd Revised Part B Received _____
- 8)* _____
- 9)* _____
- 10)* _____

* Fill in further processing/enforcement actions that have taken place

B. Summarize the principle Part B deficiencies that remain unresolved; cover all major deficiencies but in particular focus on the following:

- Incinerators - Adequacy of Trial Burn Plan
- Land Disposal Units - Adequacy of groundwater data and hydrogeological information required by 40 CFR 270.14(c)
- Has facility "detected" or "measured" groundwater contamination?
- Has the facility been required to submit a Corrective Action Plan per §§270.14(c)(8)?

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- C. For the deficiencies noted in Item B above describe the most recent action the state has taken to resolve this deficiency (NOD, Enforcement Action, etc.) and the state's or applicant's schedule and methodology for resolving the deficiency.

- D. If additional action by the state or EPA is needed to resolve outstanding deficiencies please describe what actions are proposed and what the projected dates are for those actions:

Action Proposed

Projected Date

<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>
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- E. Projected dates for making a final permit determination

Permit Activity

Projected Date

Part B Review and NOD

Dec 15 1985

Enforcement Action for
Deficient Part B

Feb 15 1986

Part B Determined Complete

July 15, 1986

EPA - Region IV

Draft Permit Prepared

Aug 30, 1986

Draft Permit Public Noticed

Sept 15 1986

Public Hearing Held

Dec 15 1986

Permit Issued/Denied

V. Summary of Facility Status and Proposed Actions (in order of priority)
for Resolving Environmental Problems

- 1) There is a critical situation or significant hazard at this facility which warrants some immediate action - that action should be (state reasons below)

_____ a) Issue an Interim Status corrective action order

_____ b) Initiate a CERCLA immediate removal action

- 2) There is possibly a critical situation or significant hazard at this facility but adequate data is not available to make a final judgement - gathering of additional data should be expedited by

_____ a) Issuing a compliance order under section 3008(h), 3013 of RCRA or an information request under 3007

_____ b) Using CERCLA contractor

_____ c) Using EPA or State Personnel to take samples and run analyses

- 3) Although there does not appear to be a significant hazard at this facility. There is groundwater contamination present that will require corrective action. Would it be advisable to begin corrective action prior to the RCRA permit being issued?

_____ a) Yes, it would. Issue an interim status corrective action order

_____ b) No, there is no need to begin corrective action prior to the RCRA permit being issued

- 4) There does not appear to be a critical situation or imminent hazard - environmental problems will be handled as follows (state reasons below)

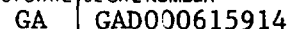
- ☒ a) Normal processing of RCRA Part B application with compliance schedule for any corrective action needed including prior releases from Solid Waste Management Units
- ☐ b) Expedited Processing of RCRA Part B application with compliance schedule for any corrective action needed including prior releases from Solid Waste Management Units
- ☐ c) Normal processing of RCRA Part B application simultaneously with CERCLA remedial activities

- 5) In regard to the status of the Part B application review, from Section III the following actions are needed to resolve outstanding Part B deficiencies.

RECEIVED
MAR 28 1984

list in EARL
8/24/84

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT		I. IDENTIFICATION	
		01 STATE GA	02 SITE NUMBER GAD000615914
II. SITE NAME AND LOCATION			
01 SITE NAME (Legal, common, or descriptive name of site) Boeing Machine Products		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 7979 N.E. Industrial Blvd.	
03 CITY Macon	04 STATE GA	05 ZIP CODE 31297	06 COUNTY Bibb
09 COORDINATES LATITUDE 3 2° 4 1' 3 9.8"		LONGITUDE 0 83° 40' 1 6.4"	
10 DIRECTIONS TO SITE (Starting from nearest public road) North from U.S. 41 and Echeconnee Creek, turn right on Avondale Mill Road. The building is on left just past first road on left.			
III. RESPONSIBLE PARTIES			
01 OWNER (If known) The Boeing Company		02 STREET (Business, mailing, residential) P.O. Box 3707 m/s 17-31	
03 CITY Seattle	04 STATE WA	05 ZIP CODE 98124	06 TELEPHONE NUMBER (206) 655-1131
07 OPERATOR (If known and different from owner) Boeing Machine Products, Inc.		08 STREET (Business, mailing, residential) P.O. Box 10248 Wilson Airport	
09 CITY Macon	10 STATE GA	11 ZIP CODE 31297	12 TELEPHONE NUMBER (912) 781-3000
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN			
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3001 DATE RECEIVED: <u>8/18/80</u> MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: _____ MONTH DAY YEAR <input type="checkbox"/> C. NONE			
IV. CHARACTERIZATION OF POTENTIAL HAZARD			
01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE <u>3/22/83</u> MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify)	
CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION <u>1981</u> BEGINNING YEAR <u>Present</u> ENDING YEAR <input type="checkbox"/> UNKNOWN	
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Waste water treatment sludges from conversion coating of aluminum and spent non-halogenated solvents (Acetone, MEK and Toulene). <i>not a landfill on the site CBN 4/6/84 telephone conv. w/ Dave</i>			
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Site inspections by state indicate that small spills from roll-off containers were apparent flowing into the parking lot. A spill from the scrubber water system occurred on July 8, 1983. This spill was cleaned up to the satisfaction of EPD personnel (see attached. This facilities activities are regulated under the GA Haz. Waste Management Act.			
V. PRIORITY ASSESSMENT (RCRA). <i>Active RCRA</i>			
01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time available basis) <input checked="" type="checkbox"/> D. NONE (No further action needed, complete current disposition form)			
VI. INFORMATION AVAILABLE FROM			
01 CONTACT Robert Barrett		02 OF (Agency/Organization) Boeing Machine Products	
04 PERSON RESPONSIBLE FOR ASSESSMENT David A. Brackett <i>EA13</i>		03 TELEPHONE NUMBER 912) 781-3000	
05 AGENCY D.N.R.	06 ORGANIZATION E.P.D.	07 TELEPHONE NUMBER (404) 656-2836	08 DATE 3/1/84 MONTH DAY YEAR



<input checked="" type="checkbox"/> A. TOXIC	<input type="checkbox"/> E. SOLUBLE	<input type="checkbox"/> I. HIGHLY VOLATILE
<input type="checkbox"/> B. CORROSIVE	<input type="checkbox"/> F. INFECTIOUS	<input type="checkbox"/> J. EXPLOSIVE
<input type="checkbox"/> C. RADIOACTIVE	<input type="checkbox"/> G. FLAMMABLE	<input type="checkbox"/> K. REACTIVE
<input type="checkbox"/> D. PERSISTENT	<input checked="" type="checkbox"/> H. IGNITABLE	<input type="checkbox"/> L. INCOMPATIBLE
		<input type="checkbox"/> M. NOT APPLICABLE



**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT**

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) 04 NARRATIVE DESCRIPTION

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS *(Continued)*

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION *(include name(s) of species)*

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff/standing liquids/leaking drums)

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION *(Cite specific references, e.g., state files, sample analysis, reports)*

PRINT ENTRY NH C101 EQ GAD000.

PRINT ENTRY NH C101 EQ GAD0000...

1* 04

2* GA

101* GAD0000615914

104* BOEING MACHINE PRODUCTS

110* 7898 41ST HWY S

111* MACON

112* 31201

120* BIBB

121* 021

130* 08

300* 840209

301* H

302* D

303* N

312* 1

322* 12850.0

323* 894100.0

1301* 1

1302* PART A- ON FILE

1001* SD

1011* 8008

*Enter PA of
F.4C3
+comp*

Telephone Memo for Preliminary Assessments

1. Facility Information:

E.P.A. ID. #: GHD000615914

Site Name: Boeing Machine Rod

2. Contact Information:

Name and Title: Robbie Burnett, Hazardous Waste Administrator

Address: P.O. Box 10248, Wilson Airport, Mason, GA 31297

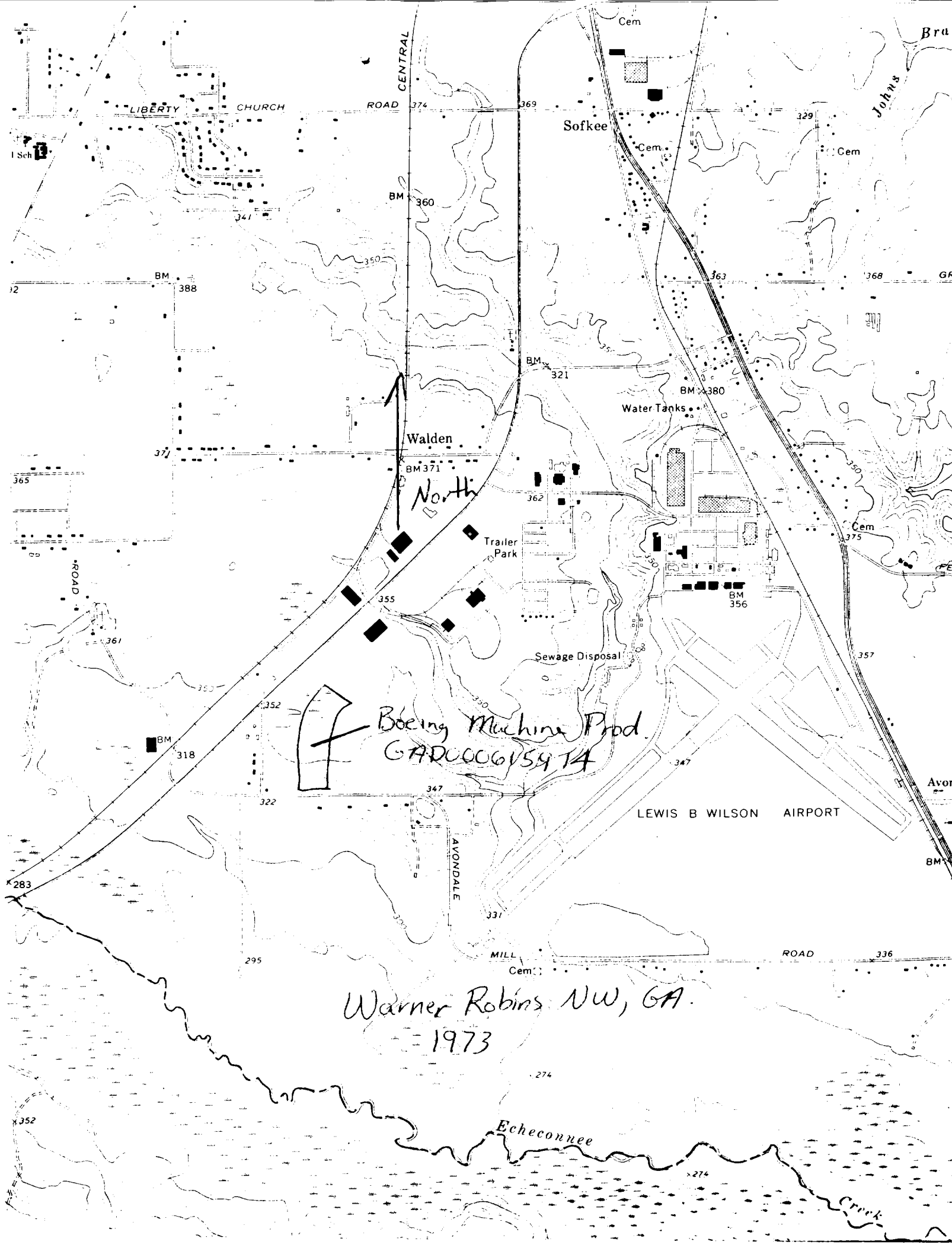
Phone: (912) 781-3000

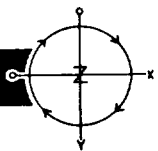
3. Did the facility handle hazardous waste prior to 1980? ☒ No - facility built in 1981
- Yes - _____ where did they dispose of the hazardous waste?

From	To	Disposal Location

4. Has there ever been a spill or other release to the environment?

When	Description
July 1983	See attached letter





BOEING MACHINE PRODUCTS, INC.

A SUBSIDIARY OF THE **BOEING** COMPANY

P.O. BOX 10248 • WILSON AIRPORT • MACON, GEORGIA 31297 • 912/781-3000

July 14, 1983

Jennifer
Mr. John D. Taylor
Program Manager
Industrial Hazardous Waste Management
Department of Natural Resources
Environmental Protection Division
270 Washington Street, S.W.
Atlanta, Georgia 30334

RECEIVED

JUL 15 1983

ENVIRONMENTAL PROTECTION DIVISION
LAND PROTECTION BRANCH

Dear Sir:

On 8 July there was approximately 3,000 gallons of water spilled from the fume scrubbers in our plating area. The following is a dissertation of the events of 8 and 9 July, 1983.

At 2:45 p.m., 8 July, water was found to be running across the parking lot at the northwest corner of the building. This water was flowing into the storm drain in the lot. An investigation found a burst pipe on the scrubber water system. The pump feeding the system was immediately shut off. The following actions were then taken:

1. A dam was constructed in the drainage ditch to prevent any further travel of the water.
2. A sample of the water was analyzed.
Results: ph 8.2
Total chrome 6ppm
3. Water inside the building (approximately 2/3 of spill) diverted to the waste treatment system.
4. Absorbent material used to clean up water in the parking lot.
5. EPD notified and asked for guidance in cleanup.
6. Standing water in ditch dipped out or absorbed.

(9 July, 1983)

7. A minimum of 3" of earth removed from the bottom of the ditch and placed in hazardous waste disposal containers. (Roll-offs for HW sludge)

If you have any questions please contact me at 912-781-3000.

Sincerely yours,

Robbie Barrett
Robbie Barrett

Hazardous Waste Administrator

PRELIMINARY ASSESSMENT CHECKLIST (revised 2/6/84)

✓ EPA SITE IDENTIFICATION NUMBER GAD000615914

Site Name and Location

✓ Site Name

✓ Specific Location (include street number)

✓ City, State, Zip Code

✓ County, County Code

✓ Congressional District

✓ Coordinates

✓ Directions to site from nearest public road

Responsible Parties

✓ Owner

✓ Owner address and telephone

✓ Operator (indicate if same as owner)

✓ Operator address and telephone

✓ Type of ownership

✓ Owner/Operator notification

Characterization of Potential Hazard

✓ Site Inspection

✓ Site Status

✓ Years of operation

✓ Substances known or alleged on site

✓ Potential Hazard Description (include relative population, water body in vicinity)

✓ Priority Assessment

Call Brachett
do they ship
waste?

— Send it to
WWT plant?

— is there a
landfill?

Information

_____ Contact, phone number

_____ Person responsible for preliminary assessment, phone number

Waste Information

_____ Waste physical states

_____ Waste quantities

_____ Waste characteristics

_____ Waste type, comments (what kind of sludge?)

_____ Name of hazardous substances possibly/actually present

_____ CAS number of hazardous substance

_____ Storage/disposal method w/hazardous substances

_____ Concentration of hazardous substances

_____ Measure of concentration

_____ Feedstock Name

Sources of information

_____ Date of Report Cited

_____ Other Sources Recommended

Description of Hazardous Conditions, etc.

_____ Need More Information

_____ Need Narrative Description

_____ Surface Water Name (Is there a river, lake, stream nearby?)

_____ Potential Population (name of town, number of residents)

_____ Pertinent Hydrogeologic Information (Is this an aquifer recharge area? What are the significant geologic structures in the vicinity?)

_____ Other (see note)

3/28/84

EG - ERRIS REGIONAL ENTRIES SCREEN

A C T	ENTRY CODE	DESCRIPTION	DATE1 (PLANNING)	DATE2 (START)	DATE3 (STOP)	FREE FIELD
OK	EPA ID NO	GA D 0 2 5 8 1 5 0 1 5	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	
OK	EPA ID NO	GA D 0 5 8 4 8 2 8 2 2	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	
OK	EPA ID NO	GA D 0 0 0 6 0 8 3 2 3	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	
HOLD	EPA ID NO	GA D 0 0 3 3 0 0 2 6 9	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	
HOLD	EPA ID NO	GA D 0 2 5 8 0 5 8 2 6	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	
HOLD	EPA ID NO	GA D 0 0 0 6 1 5 2 1 4	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	
HOLD	EPA ID NO	GA D 2 8 0 7 2 2 2 7 4	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	
HOLD	EPA ID NO	GA D 0 8 4 9 1 4 7 8 7	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	
	EPA ID NO	D	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	
	EPA ID NO	D	/ /	/ /	/ /	
A	L1		/ /	/ /	/ /	

Marie, In addition
there is Boeing
information on Boeing
Modern Products you asked
for. TOP No F4-8968-41
Julie Keller



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

TRIP REPORT March 28, 1983

J. LEONARD LEDBETTER
Division Director

Site Name & Location: Boeing Machine Products, Macon

Trip By: Margaret Markey *MM*

Date of Trip: March 22, 1983, 10:15 AM

Officials Contacted: Robbie Barrett, Hazardous Waste Administrator, P.O.
Box 10248, Wilson Airport, Macon, GA, 31297,
912/781-3000

Reference: Letter of Warning to Roy Myer from Jennier Kaduck, 2-2-83

Comments:

At the time of the initial ISS inspection of Boeing on 1-13-83, numerous violations were noted (see reference). This inspection was conducted as a follow-up inspection to observe progress toward compliance.

A major problem identified during the last inspection was that many drums were unidentified, and drums were not kept closed or clearly marked. This problem has been corrected by establishing three drum storage areas. One area contains paint wastes, another contains spent solvents which have been sampled and analyzed for contents, and a third contains spent solvents which have yet to be tested. All areas were secured and all drums were closed and clearly marked with the appropriate placards.

The contents of each of the 2 underground storage tanks were tested. The tank containing waste oil only proved non-hazardous and on this day was being pumped out by Barton Environmental Services for transport to the city of Macon POTW. The other tank now collects runoff solely from spills in the drum storage area as a result of the realignment of these areas. When full, this tank's contents will be tested to determine a proper method of disposal.

The sludge press was being adjusted during this inspection so that sludge would fall more directly into the roll-off. The roll-offs were covered with canvas tops and the area was cordoned off and identified with warning signs. Plans are being made to construct a dike around this area.

A contingency plan, training program, inspection log, operating record and closure plan had all been developed and were being implemented.

Conclusions:

Boeing Machine Products is not in violation of the Georgia Rules for Hazardous Waste Management.

Recommendations: Continue with routine inspections as needed.

Photos: None

Reviewed By:

Attachments: ISS Inspection Sheet

File: Boeing Machine Products, Macon (R)

MM:bpk:2663C



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

75

J. LEONARD LEDBETTER
Division Director

TRIP REPORT

February 2, 1983

Site Name & Location: Boeing Machine Products, Inc., 7979 N.E. Industrial Blvd., Macon, GA, 31297, Telephone: 912/781-3000

Trip By: Margaret Markey *MEM*

Accompanied By: Bert Langley *BL*

Date of Trip: January 13, 1983

Officials Contacted: Robbie Barrett, Haz. Waste Administrator
Bill Durden, Facilities Manager
Roy Myer, Vice President
Boeing Machine Products, Inc., 912/781-3000
7979 N.E. Industrial Blvd., Macon, GA, 31297

Reference: Part A Application

Comments:

1. After reaching the site Ms. Markey and Mr. Langley met with Mr. Robbie Barrett who is the hazardous waste administrator at the plant. If in the future some information is needed he is the main contact. If Mr. Barrett is not available then Mr. Bill Durden, facilities manager, or Mr. Roy Myer, vice president, can be contacted.
2. Prior to the actual ISS inspection, Mr. Barrett explained the various processes used at Boeing and Mr. Langley and Ms. Markey were allowed to inspect the process lines in the plant.
3. After examining the plant facilities, the hazardous waste storage and treatment facilities were inspected.
4. The hazardous waste facilities at Boeing consist of:
 - a. Drum storage for spent solvents primarily.
 - b. Tank storage, primarily for waste oil but actually used for a variety of materials. At one point sufficient solvents were mixed with the waste oil that the entire tank of material was classified as a hazardous waste.
 - c. Storage for sludge from the wastewater treatment facility on site. This sludge is a listed hazardous material. Electroplating sludges from processes using cyanide are the primary component. The material also contains some chromium.
 - d. A treatment plant which consists of a semi-permeable membrane filter system, tank storage, a cyanide reduction package and a chromium reduction package. This system generates the sludge described above.
5. The Boeing facility manufactures aircraft parts and consists of a large machine shop and a plating shop. It is the latter which generates most of the hazardous waste. The machine shop generates some spent solvents but the cyanide and chromium wastes are associated with the plating operation.

6. The treatment system and tank storage is surrounded by a dike sufficient to contain the entire volume of the system. Adequate warning signs etc. were present. The only violation noted was that inspection records were not maintained.
7. The drum storage area presents some problems. Drums are currently stored in two locations. One of these is a small concrete pad surrounded by a locked fence. Two drums were stored here. Mr. Barrett indicated that this facility had recently been filled and the drums were moved to another storage area.

The second storage area contained a mixture of waste drums, empty drums, drums containing solvent currently in use and drums no one was sure contained what. In general housekeeping here was very poor. The waste drums were generally segregated in one corner of the area, but several drums were not actually with the waste drums but appeared to contain waste. The waste drums were not adequately labeled, and it could not be readily determined what they actually contained. One drum was open. Another drum, labeled spent 1,1,1-trichloroethane was separated from the waste drums and when questioned Mr. Barrett indicated the drum was an "empty", upon examination it proved to be full but there was no way to be sure of what.
8. The sludge generated from the wastewater treatment process is a listed hazardous waste. Currently this material is dumped into a small roll-off container and transported to a hazardous waste landfill. However, Boeing has two such containers. When one is filled it is covered with plastic and placed outside. The area used to store this container is an open parking lot with no security. Also, due to a design flaw some of the sludge is not dumped into the container but falls outside of it and is contaminating the concrete pad on which the container rests and the parking lot.
9. Boeing has two tanks used primarily to store waste oil. No problems were seen with them except that on the Part A application they are listed as 2500 gallons in capacity and in reality they are 8500 gallons in capacity.
10. Boeing's files were next examined and a number of inadequacies were discovered. There is no written waste analysis plan, no inspection log, no personnel training records, and no written closure plan. These and other violations are listed on the ISS inspection checklist.

Conclusions:

Boeing is in violation of a number of regulations. Most of their paperwork is not adequate. However, Mr. Barrett appeared willing to correct this matter. In fact he indicated that he had already been approached by his superiors concerning the state of his files.

A more serious problem is the overall poor housekeeping at the facility. There is not adequate control over the hazardous waste stored on-site. Too many people have access to it and the material is not stored or labelled properly. In addition there is no control at all over the hazardous sludge.

Recommendations & Follow-Up Required:

Write letter to Boeing detailing violations.

Re-inspect facility to determine if violations have been corrected.

Photographs: None

Reviewed By: *gmk*

BL:bpk:2234C

cc: Margaret Markey

File: Boeing Machine Products, Inc. (R)

RCRA/NPL POLICY QUESTIONNAIRE FOR INITIAL SCREENING

Site Name: Boeing Machine Products

City: Macon State: GA

EPA I.D. Number: GAD000615914

Type of Facility: Generator X Treatment Transporter Storage (more than 90 days) Disposal

I. RCRA APPLICABILITY

yes no

Has this facility treated, stored or disposed of a RCRA hazardous waste since Nov. 19, 1980? X

Has a RCRA Facility Assessment (RFA) been performed on this site? X

Does the facility have a RCRA operating or post-closure permit? If so, date issued X

Did the facility file a RCRA Part A application? X
If so:

1) Does the facility currently have interim status? X

2) Did the facility withdraw its interim status? X

3) Is the facility a known or possible protective filer? X

Is the facility a late (after Nov. 19, 1980) or non-filer that has been identified by EPA or the State? X

STOP HERE IF ALL ANSWERS TO QUESTIONS IN SECTION I ARE NO

II. FINANCIAL STATUS

Is the facility owned by an entity that has filed for bankruptcy under federal or State laws?

III. RCRA ENFORCEMENT STATUS

Has the facility lost authorization to operate or had its interim status revoked?

Has the facility been involved in any other RCRA enforcement action?